

REMARKS

Claims 1-25 are pending, of which claims 1 and 8 are independent method claims with generally corresponding computer program product claims 13 and 20, and claim 25 is an independent system. By this paper, claims 1, 8, 13, 20, and 25 have been amended, as indicated above.

The Office Action objected to Figure 2 for failing to include a reference number 206b as described in the Specification at line 9 of page 15. In the amended Figure 2 attached to this paper, Applicants have corrected the typographical error in the reference number for the server on the right side of memory 208 from "206a" (which is the correct reference number for the server on the left side of memory 208) to "206b" in order to make the reference number consistent with the Specification at line 9 of page 15.

The Office Action rejected claims 1-25 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,061,740 to Ferguson et al. ("*Ferguson*") in view of U.S. Patent No. 6,385,618 to Ng et al. ("*Ng*").¹

Applicants' invention, as claimed for example in independent method claim 1 relates to supporting different security descriptor specifications for the same object. The method includes converting a first security descriptor into a version of the first security descriptor that follows a second security descriptor specification, comparing the converted version of the first security descriptor with a second security descriptor, and changing the second security descriptor to reflect at least one security permission change as represented in the converted version of the first security descriptor so that any changes to the second security descriptor are non-degenerative and reversible. The method further includes undoing the at least one security permission change in the second security descriptor, converting the second security descriptor into a version of the second security descriptor that follows the first security descriptor specification, comparing the converted version of the second security descriptor with the first security descriptor, and changing the first security descriptor to reflect the undone security permission change as represented in the converted version of the second security descriptor so that any change to the

¹Although the prior art status of *Ferguson* and *Ng* is not being challenged at this time, Applicants reserve the right to do so in the future. Accordingly, any arguments and amendments made herein should not be construed as acquiescing to any prior art status or asserted teachings of *Ferguson* and *Ng*.

first security descriptor is non-degenerative and reversible. Each of the pending independent claims is directed to similar subject matter.

Ferguson discloses an administration system for centralized management of a heterogenous network. Col. 8, ll. 41-42. With reference to Figure 4, a management service includes a set of representation objects 90 within a distributed directory for representing foreign objects 87. Col. 9, ll. 1-3. When a change to representation object 90 is detected, an event monitor sends a message to a replication agent 89 to synchronize foreign objects 87. Col. 9, ll. 8-32. The administration system acts as a one-way synchronization between replication objects 90 and the foreign objects 87. Col. 9, ll. 35-37. In an example illustrated in Figure 6 that involves Microsoft's Security Accounts Manager ("SAM") and Novell Directory Services ("NDS"), *Ferguson* states that NDS values trump SAM values. Col. 14, ll. 33-35.

Ng discloses an object-relational mapping tool. Col. 3, ll. 33-38. The object-relational mapping tool reads a database to examine its schema, constructs a data structure to reflect this schema, generates an object model based on the data structure, and creates source code based on the object model. Col. 5, ll. 23-27. Using the object-relational mapping tool, a programmer can customize the object model. Col. 6, ll. 4-5. After the programmer customizes the object model, however, a database administrator may update the database. Col. 7, ll. 5-12. In order to keep from losing the customizations when the programmer updates the source code to include the database update, the object relational mapping tool, imports the new database schema to create a new data structure, compares the old data structure with the new data structure to isolate the database changes, updates the object model to reflect the identified database changes without disturbing the changes made by the programmer, and generates new source code from the updated object model. Col. 7, ll. 13-60. Similar to *Ferguson*, *Ng* also discloses a one-way operation from schema to data structure to object model to source code.

Accordingly, *Ferguson* and *Ng* fail to teach, suggest, or motivate non-degenerative and reversible changes to different security descriptors for the same object. Among other things, *Ferguson* and *Ng* fail to teach, suggest, or motivate: (i) converting a first security descriptor into a version of the first security descriptor that follows a second security descriptor specification, (ii) changing a second security descriptor to reflect at least one security permission change as represented in the converted version of the first security descriptor, (iii) undoing the at least one security permission change in the second security descriptor, (iv) converting the second security

descriptor into a version of the second security descriptor that follows the first security descriptor specification, (v) changing the first security descriptor to reflect the undone security permission change as represented in the converted version of the second security descriptor, so that any changes to the first and second security descriptor are non-degenerative and reversible, as claimed for example in independent method claim 1. Similar reasoning applies to each of the other pending independent claims, 8, 13, 20, and 25. Applicants respectfully submit, therefore, that the rejection of the pending claims under 35 U.S.C. § 103(a) as unpatentable over *Ferguson* in view of *Ng* should be withdrawn.

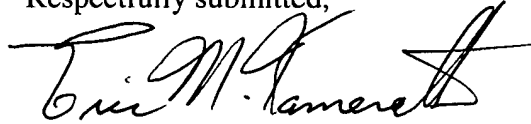
Applicants also respectfully submit that the motivation or rationale to combine *Ferguson* and *Ng* as stated in the Office Action is improper. Specifically, the Office Action asserts that "it would have been obvious to one of ordinary skill in the art at the time the invention was made to modify the method of *Ferguson* . . . in order to alleviate programmers from having to recreate their customization . . . as taught by *Ng* . . . to save significant development time." Office Action, p. 4 (rejection of claim 1). However, "[i]t is improper to combine references where the references teach away from their combination." MPEP § 2145(X)(D)(2). Furthermore, "[a] prior art reference that 'teaches away' from the claimed invention is a significant factor to be considered in determining obviousness." MPEP § 2145(X)(D)(1). As indicated above, *Ferguson* teaches that NDS values trump SAM values, which is contrary to Applicants' claimed invention for non-degenerative and reversible changes, as claimed for example in independent claims 1, 8, 13, 20, and 25, and is contrary to *Ng*'s goal preserving programmer customizations to the object model. Keeping in mind that *Ferguson*'s teaching that NDS values trump SAM values is in connection with an integration utility for user and group objects underscores the relevance of *Ferguson*'s contrary position with respect to Applicants claimed invention.

Based on at least the foregoing reasons, Applicants respectfully submit that the cited prior art fails to anticipate or make obvious Applicants invention, as claimed for example, in independent claims 1, 8, 13, 20, and 25. Applicants note for the record that the remarks above render the remaining rejections of record for the independent and dependent claims moot, and thus addressing individual rejections or assertion with respect to the teachings of the cited art is unnecessary at the present time, but may be undertaken in the future if necessary or desirable, and Applicants reserve the right to do so.

In the event that the Examiner finds any remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney.

Dated this 29th day of April, 2004.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Eric M. Kamerath", with a stylized flourish at the end.

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